

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION

<p>JANE DOE & JOHN DOE, individually and on behalf of the minor, June Doe,</p> <p style="text-align: center;">Plaintiffs</p> <p>vs.</p> <p>NEW LEAF ACADEMY OF NORTH CAROLINA, LLC; and TRAILS CAROLINA, LLC,</p> <p style="text-align: center;">Defendants.</p>	<p>CIVIL ACTION NO. <u>8:10-2365-JMC</u></p> <p>ANSWERS OF NEW LEAF ACADEMY OF NORTH CAROLINA, LLC TO LOCAL RULE 26.01 INTERROGATORIES</p>
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Pursuant to Local Rule 26.01 of the U.S. District Court Local Civil Rules, Defendant New Leaf Academy of North Carolina, LLC (hereinafter "Defendant") respectfully submits the following answers to the Court's standard interrogatories as follows:

A. State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: None known.

B. As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: Plaintiff has sought a jury trial on all.

C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER: No.

- (1) Not applicable.
- (2) Not applicable.
- (3) Not applicable.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER: This case was filed in the Court of Common Pleas of Pickens County, South Carolina and removed to this Court by New Leaf Academy of North Carolina, LLC.

E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: None known.

F. [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: Defendant New Leaf is properly identified.

G. [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER: None known at this time.

Dated: September 10, 2010

MCNAIR LAW FIRM, P.A.

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